

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**DONNA M. RENNER and  
SCOTT D. RENNER, her husband,  
207 Clairborne Way  
Sewell, NJ 08080**

**vs.**

**WIDENER UNIVERSITY, INC.,  
and/or WIDENER UNIVERSITY  
CENTER FOR EDUCATION, its  
agents, servants and/or employees  
One University Place  
Chester, PA 19013**

**CIVIL ACTION**

**NO.**

**JURY TRIAL DEMANDED**

**COMPLAINT**

**JURISDICTION AND VENUE**

1. Plaintiffs, Donna M. Renner and Scott D. Renner, her husband, are adult individuals and residents of the State of New Jersey, residing at 207 Clairborne Way, Sewell, Washington Township, New Jersey.

2. Defendant, Widener University, Inc., and/or Widener University Center for Education, is a non-profit educational corporation duly licensed and authorized to conduct business in the Commonwealth of Pennsylvania with its registered agent, corporate headquarters and/or principal place of business located at One University Place, Chester, Pennsylvania.

3. This Court has jurisdiction over this action pursuant to Diversity of Citizenship, 28 U.S.C. § 1332(a) as the parties are citizens of different states and the amount in controversy is in excess of \$150,000.00, exclusive of interest and cost.

4. Venue is properly laid in the Eastern District of Pennsylvania as the Defendant is located in this district and the claim arose in this district.

**FIRST CLAIM FOR RELIEF**

5. Plaintiff, Donna M. Renner, hereby incorporates by reference the allegations of Paragraphs 1 through 4 as if fully set forth at length herein.

6. At all times material hereto, the Defendant, Widener University, Inc., and/or Widener University Center for Education, did have exclusive care, custody and control of their place of business located at One University Place, Chester, Pennsylvania; and more specifically, the Gymnasium located in the Schwartz Physical Education Center located on campus at 17<sup>th</sup> & Melrose Avenue, Chester, Pennsylvania.

7. On or about January 18, 2009, at approximately 1:30 p.m., the Plaintiff, Donna M. Renner, was a social invitee attending a cheerleading competition on the premises of the Defendant as aforesaid.

8. At the time, date and location as aforesaid, the Defendant, Widener University, Inc., and/or Widener University Center for Education, its agents, servants and/or employees, did carelessly and/or negligently construct, maintain, design, install and/or inspect the bleachers located in the Gymnasium of the Schwartz Physical Education Center for structural integrity and safety which said carelessness and/or

negligence proximately resulted in the Plaintiff, Donna M. Renner, falling while descending said bleachers, with resultant serious and severe personal injuries.

9. The aforesaid accident was not the result of any act or failure to act by the Plaintiff, Donna M. Renner.

10. As a direct and proximate result of the carelessness and/or negligence of the Defendant, Widener University, Inc., and/or Widener University Center for Education, as aforesaid, the Plaintiff, Donna M. Renner, was injured both grievously and irreversibly; she has in the past and will in the future be plagued by great pain, shock and mental anguish; she has been required to expend large sums of money for hospital and medical in an effort to alleviate the pain from which she is suffering; and has in the past and will in the future be prevented from attending to her lawful affairs, activities and occupations

WHEREFORE, Plaintiff, Donna M. Renner, demands judgment against the Defendant, Widener University, Inc., and/or Widener University Center for Education, its agents, servants and/or employees, for an amount in excess of \$150,000.00, together with interest cost of suit and any other further remedy deemed appropriate by this Honorable Court.

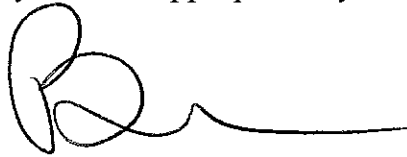
#### **SECOND CLAIM FOR RELIEF**

11. Plaintiff, Scott D. Renner, hereby repeats each and every allegation of Paragraphs 1 through 10 as if fully set forth at length herein.

12. At all times material hereto, the Plaintiff, Scott D. Renner, is and was the husband of Plaintiff, Donna M. Renner.

13. As a direct and proximate result of the carelessness and/or negligence of the Defendant, Widener University, Inc., and/or Widener University Center for Education, the Plaintiff, Scott D. Renner, was and will be deprived of the services, earnings, comfort, society and/or consortium of his wife, Donna M. Renner, for a long period of time.

WHEREFORE, Plaintiff, Scott D. Renner, demands judgment against the Defendant, Widener University, Inc., and/or Widener University Center for Education, its agents, servants and/or employees, for an amount in excess of \$150,000.00, together with interest, costs of suit and any further remedy deemed appropriate by this Honorable Court.

A handwritten signature in black ink, appearing to be 'B. Hockfield', with a long horizontal flourish extending to the right.

---

Barry J. Hockfield, Esquire  
HOCKFIELD, HASNER & KASHER, P.A.  
425 Route 70 West  
Cherry Hill, NJ 08002  
Phone: 856-429-1802  
Fax: 856-429-6951  
[sg@hockfieldlaw.com](mailto:sg@hockfieldlaw.com)

Date: July 28, 2009